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Food Protection Guidelines

It should be understood that the owner/operator of the food establishment is a customer receiving a product (the inspection report) and he/she should be able to find that product usable, practical, and understandable. An atmosphere of cooperation and partnership is encouraged to promote and protect public health.

Facilities Inspected

Restaurants; Catering Operations; Mobile Food Service, Meat Markets; Retail Grocery; Senior Citizens Centers; School Cafeterias; Congregate Dining; Taverns; Summer Feeding (Preparation & Service sites); Bakeries; Delicatessens; *Temporary Events; Food Pantries and Food Processors.

*Temporary events must be included in your inventory of food establishments and included in your agency work plan to be inspected on the basis of risk prioritization.

Inspection Guidelines

All LPHA's must have a work plan to guide their food program; these work plans must include a protocol for determining inspection frequencies; define when follow up inspections are to be conducted and procedures for response to complaints. Each LPHA must maintain an accurate and up-to-date inventory of all food establishments within their jurisdiction. At a minimum, the name of all establishments, their location, current risk rating and most recent inspection date should be kept. This inventory should be made available to DHSS upon request for contract monitoring or survey purposes.

Frequency of inspection should be determined by public health priority, which is calculated by the Food Establishment Public Health Priority Assessment Worksheet (**see subsection 3.1: Forms**) or by any other scientifically sound process that determines risk. Food establishments in the high-risk category should be inspected on a more frequent basis than medium risk facilities, which in turn, should be inspected on a more frequent basis than low risk facilities. A suggested minimum inspection frequency is once every 9 months for high risk food facilities; once every 12 months for medium risk facilities; and once every 18 months for low risk facilities.

Inspections performed under 19 CSR 20-1.025 *Sanitation of Food Establishments* shall be performed on the DHSS form E6.37 and E6.37A, Food Establishment Inspection Report. All inspections are to be conducted using the principles of Hazard Analysis Critical Control Points (HACCP) as a basis for recommendations and enforcement actions.

The inspection process includes completing the inspection report form where code violations and needed corrective action are noted, as well as a narrative discussion of the findings and possible recommendations of compliance with the owner/operator/manager.

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The effectiveness of inspections will be increased with involvement of the food establishment operators during the inspections. Therefore, they should be encouraged to accompany the environmental public health specialist during the inspection, but their participation is not mandated.

Prior to an inspection, the most recent past inspection should be reviewed. An inspection should begin with the environmental public health specialist and management reviewing the menu and discussing other pertinent information about the facility that will assist in making the inspection. The inspection will cover the 1999 Missouri Food Code, 19 CSR 20-1.025 Sanitation of Food Establishments and any post 1999 amendments to this code adopted by the State of Missouri or an equally stringent local code.

Emphasis should be placed on critical items that relate to those factors that lead directly to food-borne illness, especially food product temperature controls, cross contamination, sanitation, employee health and personal cleanliness and management's knowledge of those issues with respect to that establishment's operations. The food borne illness risk factors and interventions are presented on page 1 of E6.37, Food Establishment Inspection Report. The importance of documenting the occurrence of other critical violations such as the presence of plumbing cross-connections, or the lack of a hand-washing sink, should not be minimized. Likewise, non-critical items in violation, such as missing light shields, missing floor tiles, and dirty non-food contact surfaces, are to be documented on the inspection report form as well.

Be cognizant of the fact that there are different levels of severity among critical items. Note each item not in compliance on the inspection report form, placing the corresponding code reference number in the code reference block in either critical items or non-critical items. The code reference block must list the chapter and specific subsection of the chapter that is in violation. (For instance, if the lights within the food preparation area were not shatter resistant/shielded the code reference would be 6-202.11). Proper documentation of violations includes stating the violation, the location(s) in the establishment where the violation is present, code reference number cited as stated above, corrective action needed, and "correct by date."

When noting violations on the inspection report form, be sure to write observations on the inspection report and not conclusions. Example: "Chicken on steam table at 125°F" or "Kitchen floor has 1/4" of grease under equipment." Do not write, "Chicken must be kept above 140°F on steam table" or "Clean the kitchen floor", as these are conclusions or directions and do not specify the violation as seen during the inspection. Write the narrative as if an outsider was going to read it and had to determine the violation you observed. When providing recommendations for compliance, place them after your observation, i.e. "Food on steam table at 125°F - Food must be kept above 135°F on steam table".

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- A. Use the same violation number or item for the same piece of equipment, surface, room, etc.

Example: CRITICAL ITEM

#3-501.16(A) Chicken, Beef, and Pork on Steam table at 120°F.

NON-CRITICAL ITEM

#6-501.11 Kitchen floor many tiles broken - needs repair.

- B. Use multiple numbers or items when you change pieces of equipment, rooms, processes, etc.

Example: CRITICAL ITEM

#3-501.16(A) Chicken, Beef and Pork on steam table at 120°F.

#3-501.16(A) Chicken on stove at 120°F.

#3-501.16(B) Chicken in refrigerator at 60°F

#3-501.14(A) Chicken cooling in refrigerator at 60°F after 6 hours

#3-302.11 Cross contamination observed during processing of chicken cutting board was not cleaned between cutting up raw chicken and slicing cooked chicken.

#3-302.11 Cross contamination observed as blood from meat in walk-in dripped in lettuce - lettuce voluntarily destroyed.

#7-201102.11 Cleaners in unmarked bottles.

#7-202.11 Unapproved Insecticide.

#7-201.11 Chemical spray bottle stored on ice machine.

NON-CRITICAL ITEM

#6-501.11 Kitchen floor many tiles broken - needs repair.

#6-501.11 Walk-in floor tiles missing - needs repair.

#4-601.11(C) Observed dust build-up on lights in food preparation area - need cleaned

#4-601.11(C) Exterior of walk-in cooler door has grease build-up – need cleaned.

Filling out the "Correct by (Date)" Section:

Place a date or time in this box if it is different than the time in the heading, i.e. "within 72 hours" for Critical Items or "by the next regular inspection" for Non-Critical items. The date placed in this box would be a date agreed upon by the Environmental Public Health Specialist and the food service operator. Discuss each violation and determine with the operator the most reasonable time to correct the violations depending on the severity of the violation. For example, explain the reasons why immediate correction is needed for a critical temperature violation, or why it would be allowable for it to take two months for a non-critical item, such as removing, and replacing broken tiles for a floor or three weeks to obtain a new threshold for the space under the back door. Use the month/day/year format i.e. 7/12/01 when designating "correct by" dates. After obtaining an agreed-upon date, have the day for each item initialed by the person who agreed to

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that date. This assures everyone that the item was discussed and agreed upon by all parties. In the event there is not mutual agreement of a compliance date, the inspector shall enter the date consistent with the preceding policy of 72 hours for compliance of critical items and next regular inspection date for non-critical items.

After discussing the inspection report and recording all comments or requested corrective actions on the inspection report form, obtain the signature of the owner, manager, or responsible person in charge. You should explain that by signing the report, the individual is acknowledging only the receipt of the inspection report. Give one copy to the owner/manager/person in charge and suggest the report be posted in the establishment.

DHSS and its representatives must strive for correctness and consistency in exercising the recognition and correction of deficiencies observed during an inspection of a food establishment. Critical items noted during an inspection require correction within a specified time frame, which should be mutually agreed upon by the environmental public health specialist and the person in charge. Problems, which constitute an immediate threat to health and safety or blatant disregard for public safety, are considered imminent health hazards and may be grounds for requesting a closing order.

Follow-Up Inspections

The severity of the violations and the inspection history of the establishment will determine the timeframe for conducting a follow up inspection. All follow-up inspections must be documented on a new Food Establishment Inspection Report form, E6.37. Follow up inspections must be conducted on food establishments when a violation of any critical item is noted and/or when numerous violations of repeat non-critical items are noted.

Violation(s) to a critical item that can lead directly to an immediate food borne illness and are not or cannot be corrected during the inspection must receive a follow-up inspection within 72 hours. Such violations include, but are not limited to, temperature abuses, cross contamination of ready-to-eat foods, personnel with infections, lack of hand washing and food contact surfaces not sanitized.

Violation(s) to a critical item that will not lead directly to an immediate food borne illness and are not or cannot be corrected during the inspection must receive a follow-up inspection within 30 days or within a timeframe agreed upon in writing by the owner/operator and the environmental public health specialist, but not to exceed 90 days. Such violations include, but are not limited to, food contact surface in disrepair, potentially hazardous ready-to-eat foods not date marked, unlabeled spray bottle, sanitizer to strong and failure to designate a person in charge.

Repeat violations to a non-critical item that are not or cannot be corrected during the inspection must receive a follow-up inspection within 90 days or within a timeframe agreed upon in writing by the owner/operator and the environmental public health specialist, not to exceed 120 days.